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GENERAL BANKRUPTCY COUNSEL FOR  
ROBERT YAQUINTO, JR., CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:	§	
	§	CASE NO. 18-32123-SGJ-7
JRJR33, INC., and	§	CASE NO. 18-32124-SGJ-7
THE LONGABERGER COMPANY	§	
	§	Jointly Administered Under
Debtors.	§	Case No. 18-32123-SGJ-7
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ROBERT YAQUINTO, JR., CHAPTER 7	§	
TRUSTEE,	§	
Plaintiff,	§	
	§	ADV. CASE NO. 20-03086
v.	§	
	§	
JGB COLLATERAL, LLC, JGB	§	
CAPITAL, LP, JGB (CAYMAN) PORT	§	
ELLEN, LTD., JGB PARTNERS, LP,	§	
ROCHON CAPITAL PARTNERS	§	
LENDING, LTD. f/k/a ROCHON	§	
CAPITAL PARTNERS, LTD., JOHN P.	§	
ROCHON, and DONNA ROCHON,	§	
	§	
Defendants.	§	

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**STATUS REPORT**

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**TO THE HONORABLE STACEY G. C. JERNIGAN,  
UNITED STATES BANKRUPTCY JUDGE:**

NOW COMES, Plaintiff Robert Yaquinto, Jr., Chapter 7 Trustee (“Trustee”) for the above-referenced debtors and Plaintiff in the above-captioned adversary proceeding (“Adversary Case”) and in response to the Clerk’s Request for Case Status [Dkt. No. 64] respectfully states as follows:

1. The Trustee filed his last status report in this matter on March 2, 2022. *See* Dkt. No. 60.

2. Since that time, the Court granted the Trustee’s Motion to Dismiss individual defendants, John P. Rochon and Donna Rochon, from the Adversary Case pursuant to the settlement approved by the Court on October 15, 2021. *See* Dkt. No. 61. Defendant Rochon Capital Partners Lending, Ltd. continues to have a pending 12(b)(6) motion to dismiss on file [Dkt. No. 48]. This motion to dismiss has been pending since June 11, 2021, and hearing on the motion has been continued on at least one occasion to allow for settlement discussions in the related adversary proceeding, but to date, the hearing has not been reset.

3. As it relates to the JGB defendants, JGB Collateral, LLC, JGB Capital, LP, JGB (Cayman) Port Ellen, Ltd. and JGB Partners, LP (collectively, the “JGB Defendants”), Trustee and his counsel are in contact with counsel for the JGB Defendants, and both parties are actively monitoring the related adversary proceeding of *JRJR33, Inc. and Agel Enterprises, Inc. v. Michael A. Bishop, et al*, Adv. No. 22-03002-sgj (the “Agel Adversary”), filed in the bankruptcy of Actitech, LP. *See* Bankr. No. 22-30049-sgj11 (Bankr. N.D. Tex.).

4. Specifically, the JGB Defendants have an interest in this related proceeding, because they have asserted a lien on the litigation proceeds of Agel Enterprises, Inc. The JGB Defendants have appeared in the Agel Adversary and have been actively involved in settlement discussions, including participating in a mediation with the parties in May 2022. Although the

initial mediation was unsuccessful, the parties are coordinating to find a date and time certain to reconvene mediation discussions. Both the Trustee and the JGB Defendants will participate in the renewed mediation.

5. Finally, the Trustee circulated a proposed agreed scheduling order to the remaining defendants at the beginning of the month and is waiting to hear back from the parties regarding their approval or disapproval of same. It is anticipated that the parties will file an agreed motion to enter agreed scheduling order in the coming weeks.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests that the Court and all parties-in-interest take notice of this status report.

Dated: June 30, 2022.

Respectfully submitted,

ROCHELLE McCULLOUGH, LLP

By: /s/ Shannon S. Thomas

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CHAPTER 7 TRUSTEE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 30, 2022 a true and correct copy of the foregoing document was served on all parties registered to receive service via the Court's ECF system.

/s/ Shannon S. Thomas  
Shannon S. Thomas